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1	DANIEL G. BOGDEN				
2	United States Attorney District of Nevada Nevada Bar No. 2137				
3					
4	FRANCESCO P. BENAVIDES, CSBN 258924 Special Assistant United States Attorney 160 Spear Street, Suite 800				
5	San Francisco, CA 94105 Telephone: 415-977-8978				
6	Facsimile: 415-744-0134 Email: francesco.benavides@ssa.gov				
7	Attorneys for Defendant				
8	UNITED STATES DISTRICT COURT				
9	DISTRICT OF NEVADA				
10	SALLIE T. GORDON,	) Case No. 2:15-cv-01809-APG-PAL			
11	Plaintiff,	) Case No. 2.13-CV-01803-AFG-FAL			
12	v.	) UNOPPOSED MOTION FOR			
13	CAROLYN W. COLVIN,	) EXTENSION OF TIME ) (FIRST REQUEST)			
14	Acting Commissioner of Social Security,	)			
15	Defendant.	) )			
16		)			
17	Defendent Constant W. Calain Astina	C			
18	Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant")				
19	respectfully requests that the Court extend the time for Defendant to file her Answer to the Complaint,				
20	due on December 14, 2015, by 30 days, through and including January 13, 2016.				
21	An extension of time is needed in order to prepare Defendant's Answer because the				
22	Commissioner is still in the process of assembling and finalizing the administrative record. This request				
23	is made in good faith with no intention to unduly delay the proceedings.				
24	Counsel for Defendant conferred with Plaintiff's counsel, Marc V. Kalagian, who has no				
25	opposition to this motion, on December 1, 2015.				
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2				Respectfully submitted,
3	Date:	<u>December 1, 2015</u>		DANIEL G. BOGDEN
4				United States Attorney
5			BY:	<u>/s/ Francesco P. Benavides</u> FRANCESCO P. BENAVIDES
6				Special Assistant United States Attorney
7				Attorneys for Defendant
8				
9		IT IS SO ORDERED:		
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11				HON. PEGGY A. LEEN
12				UNITED STATES MAGISTRATE JUDGE
13				DATED: December 3, 2015
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1 **CERTIFICATE OF SERVICE** 2 I, Francesco P. Benavides, certify that the following individual was served with a copy of the 3 UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service 4 identified below: 5 6 CM/ECF: 7 Gerald Welt 8 Gerald M. Welt, Chtd. 703 S. 8th St. 9 Las Vegas, NV 89101 Email: gmwesq@weltlaw.com 10 Marc V. Kalagian 11 Rohlfing & Kalagian, LLP 211 E. Ocean Blvd. 12 Suite 420 13 Long Beach, CA 90802 Email: marc.kalagian@rksslaw.com 14 15 Dated: December 1, 2015. 16 /s/ Francesco P. Benavides 17 FRANCESCO P. BENAVIDES Special Assistant United States Attorney 18 19 20 21 22 23 24 25 26